GHS for Pesticide Labels in the U.S.

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Pesticide labeling

- Robust U.S. system of pesticide labeling has been developed over decades.
- The conditions for safe use of pesticides are adequately addressed by instructions, warnings, precautionary statements.
- Regulations and guidance govern label wording to address specific needs of products and users.

CLA Positions

- GHS should not be implemented for FIFRA labeling of pesticide products.
- GHS is appropriate for shipping labels on containers.
- GHS provides flexibility to exclude product categories from coverage.
- GHS emphasizes hazard-based labeling to the detriment of more appropriate risk-based labeling.
- Pesticide products must be labeled for country of use; labeling for international shipment provides no improvements in protection of users.

GHS Implications

- Training programs for applicators and users would have to be updated at significant public expense.
- Secondary regulation of pesticides (state & local governments, institutions, user groups) often relies on current risk categories and signal words; would be disrupted by GHS.
- Significant additional expense would be incurred by industry, regulators, and the public sector without benefits to society.
- Identical GHS-compliant and non-compliant products would be on dealers shelves at the same time.

Costs of GHS Implementation

- Additional testing of products
- Updating training materials for pesticide safety education
- Changing 16,000+ labels (PRIA implications?)
- Changing categories may increase transportation costs of some products

Signal words to change

- On 96% of labels, signal word to change from Caution to Warning, Warning to Danger, even Caution to Danger.
- Preliminary survey of RISE members, six companies responding, 600+ products.
- Very real perception that a new signal word means the product is more hazardous, though it hasn't changed.

Does GHS require additional testing?

- GHS should be “neutral” with respect to testing requirements.
- Current toxicity categories differ from GHS categories, with overlapping but different numerical break points.
- Dosage levels in existing studies may not match break points for GHS categories.
- Companies may need to conduct new studies to avoid “higher” tox category.

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Fairness in Markets

- Unless labels of all products are changed simultaneously, market inequities are created.
- A product without GHS labeling may have a perceived market advantage over a competing product with it.
- Argues against layering GHS compliance on next routine label change for other reasons.

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GHS advantages?

- Pictograms communicate hazards effectively: **but** they confuse users, exaggerate hazards.
- Products can be packaged for international markets: **but** pesticides are labeled only for national markets.
- Fewer tox categories are less confusing: **but** fewer categories give customers less information for making choices.
- Labels would be harmonized across product categories: **but** harmonization for harmonization’s sake is not a worthy goal.

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Would GHS achieve international harmonization?

- National authorities have dozens of options to consider in implementing GHS.
- Japan has opted not to implement GHS for pesticide products.
- Europe is looking at an extended implementation period.
- New Zealand experience has been quite disruptive.
- Range of options means that even after GHS implementation worldwide, harmonization will not be achieved.

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